

Methods of Compliance

Methods of Compliance – An Open Discussion

By Melissa Sandow

Let's Talk About...

- ♦ Other ways to show compliance
 - Advisory Circulars are not the only method
- ♦ How to interpret the regulations
 - Prescriptive vs. Open Ended Rules
- ♦ Regulation Creep
 - When do we see it come up?

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Proposed Changes:

- ♦ FAR 1000A – No DER, or person acting on the direction or suggestion or supervision of the DER, may try, or attempt to try, or make attempt to try to comprehend or understand any or all, in whole or in part of the herein mentioned Federal Aviation Regulations, except as authorized by the Administrator, or an agent appointed by, or inspected by the Administrator.



Showing Compliance

- ♦ FAA is open to other methods.
- ♦ Use project planning process to identify and discuss
- ♦ Work together to understand issue, relevant regulations, and relevant guidance
- ♦ Determine path that will get to the appropriate result

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Example

- ♦ Similarity of components used on other aircraft.
 - How should a company approach similarity?
 - What is the definition of similar?
- ♦ Developing life limit for an aircraft before testing is complete

Regulation Interpretation

- ♦ Literal versus ambiguous definitions
 - 23.562 is prescriptive. Difficult to develop alternative methods
 - 23.605 is more open to varying methods.
- ♦ Use of compliance checklists

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Example -

- ♦ 23.807 – Emergency exit must be located to allow escape without crowding in any probable crash attitude...
- ♦ 23.853 – Interior flammability for non-interior modification

Regulation Creep

- ♦ Are we interpreting more conservatively than intended?
- ♦ Is safety affected by interpretation?
- ♦ Are higher requirements being imposed unnecessarily?
- ♦ Is the intent of the regulation clearly understood?

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Examples

- ♦ 23.783 – Must have a means to lock door against inadvertent opening.
- ♦ Reduction of TC'd number of passengers